



## Lead Sampling in Non-Transient Non-Community Schools

### Crosswalk for NTNC Schools

**NOTE:** If your school is served by a Community Water System, please refer to New Jersey Department of Environmental Protection's (NJDEP) [Lead Sampling in School Facilities Information page](#) for regulatory guidance.

Schools that are classified as a Non-Transient Non-Community (NTNC) public water system must comply with the Federal Lead and Copper Rule under the Safe Drinking Water Act [40 CFR 141.80 et. seq.] and the State Board of Education Regulations [N.J.A.C. 6A:26-1.2 and 12.4].

The New Jersey Division of Water Supply & Geoscience has developed a crosswalk to assist NTNC schools with lead sampling compliance.

	<b><u>BOE Regulations</u></b>	<b><u>Lead and Copper Rule</u></b>
<b>Sampling Procedures</b>		
Contaminant(s) to be analyzed	Lead	Lead and Copper
Is Material Evaluation Required?	Yes, the school shall complete a Plumbing Profile ( <a href="#">Attachment B</a> ).	Yes, the school shall complete a Material Evaluation Survey for NTNC Water Systems ( <a href="#">BWSE-17</a> )
Where to send completed lead sampling plan?	The school shall maintain the Lead Sampling Plan and use for required future lead testing.	NJDEP, upon request
Sample Frequency	Within 365 days of the effective date of the regulations <sup>1</sup> , then every six years.	Standard (Bi-annual), Annual, or Triennial
Reduced Monitoring	None	Yes, based on compliance history.
Stagnation time required	8-48 hours	6 hours minimum (no maximum time; however, taps should have been used recently)
Should pre-stagnation flushing be performed.	Only for facilities or outlets that are not currently accessible to students/staff.	No
<b>Sample Collection</b>		
Who can sample?	Personnel from the District, lab, or environmental consulting firm (if contracted).	Personnel from the District, lab, or environmental consulting firm (if contracted).
Location to be sampled	<b>ALL</b> drinking water and food preparation outlets.	Outlets typically used for human consumption. Number of outlets required is based on population served.
Sample bottle size	250 mL	1 L
Gloves required	Yes, non-colored latex or nitrile gloves required.	No

	<b><u>BOE Regulations</u></b>	<b><u>Lead and Copper Rule</u></b>
Sample Type Required	Initial First Draw Sample. If the initial first draw sample exceeds the lead action level, a follow-up flush sample is required.	First Draw Sample If an individual tap result exceeds the lead action level, the school may elect to collect a first draw confirmation sample.
Should aerators or screens be cleaned or removed prior to sampling?	No	No
Is a field reagent blank required?	No, depends on approved USEPA analytical method used at the NJ Certified Laboratory.	No, depends on approved USEPA analytical method used at the NJ Certified Laboratory.
Temperature of water to be sampled	Cold	Cold
<b>Sample Analysis</b>		
Sample invalidation procedures	The school's Quality Assurance Project Plan with the lab should include data validation procedures.	Contact NJDEP Bureau of Safe Drinking Water <sup>2</sup> . If invalidation request is approved, a replacement sample must be obtained.
Where to send samples for analysis?	NJ Certified Laboratory for lead in drinking water analysis.	NJ Certified Laboratory for lead in drinking water analysis.
Approved lead in drinking water lab analysis methods	Approved USEPA methods for lead analysis listed at 40 CFR 141.23(k)(1) and Subpart C Appendix. Reporting limit must be $\leq 2\mu\text{g/L}$ .	Approved USEPA methods for lead analysis listed at 40 CFR 141.23(k)(1) and Subpart C Appendix.
Where to submit sample results?	The school shall make sample results available on their website within 24 hours after they are reviewed and verified. The school shall also maintain sample results and use for required future testing.	New Jersey Department of Environmental Protection (NJDEP) E2 system.
<b>Public Notification</b>		
Public notification requirements	Schools must make all test results available at the school facility and on the District's website within 24 hours of verifying sample results.  If any result exceeds the lead action level, the school shall provide written notification to the parents/ guardians of all students attending the facility, as well as the Department of Education.	Lead Customer Notice required within 30 days of receiving the lead result.  Public education required 60 days following the end of the monitoring period in which the lead action level was exceeded.

	<b><u>BOE Regulations</u></b>	<b><u>Lead and Copper Rule</u></b>
<b>Remediation</b>		
Remedial Actions	<p>The school shall immediately end use of each drinking water outlet where water quality exceeds the lead action level and ensure that alternate drinking water has been made available, if necessary.</p> <p>After the replacement of any drinking water outlet or any other alteration to plumbing or service lines that may impact lead levels at the outlet, the schools shall conduct lead sampling at the impacted drinking water outlet(s).</p>	<p>If the 90<sup>th</sup> percentile result exceeds the action level, the school is required to:</p> <ol style="list-style-type: none"> <li>1. Implement and/or continue Water Quality Parameter Monitoring</li> <li>2. Implementation of Source Water Treatment Steps</li> <li>3. Implementation of Corrosion Control Treatment Steps</li> <li>4. Lead Service Line Replacement Plan, if applicable.</li> </ol>
<b>Violations</b>		
Monitoring and Reporting	Required to submit annually a Statement of Assurance that lead testing was completed in accordance with the regulations.	<p>If the required sampling procedures, analysis, and reporting are not conducted penalties may be assessed by the administrative authority.</p> <p>Upon becoming aware of the violation, the school is required to:</p> <ol style="list-style-type: none"> <li>1. Notify the Bureau of Safe Drinking Water</li> <li>2. Implement Tier 3 public notification</li> <li>3. Ensure sample collection and reporting from the minimum number of required sites in subsequent monitoring periods</li> </ol>
Treatment Technique	None	<p>If the required actions following an action level exceedance are not conducted, penalties may be assessed by the administrative authority.</p> <p>Upon becoming aware of the violation, the school is required to:</p> <ol style="list-style-type: none"> <li>1. Notify the Bureau of Safe Drinking Water</li> <li>2. Implement Tier 2 public notification</li> <li>3. Implement the required actions immediately</li> </ol>

<sup>1</sup>The BOE Regulations, N.J.A.C. 6A:26-1.2 and 12.4, became effective on July 13, 2016.

<sup>2</sup>Under the Lead and Copper Rule, a sample may be invalidated if it meets any of the following conditions:

- The laboratory establishes that improper sample analysis caused erroneous results;
- The State determines that the samples were taken from a site that did not meet the site selection criteria;
- The sample container was damaged in transit; and
- There is substantial reason to believe that the sample was subject to tampering.